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7 *Attorney for Plaintiff,*

8 *Liberty Troll LLC*

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 LIBERTY TROLL LLC,

12
13 Plaintiff,

14 vs.

15 GAIL BUMA,

16 Defendant.
17
18
19

Case No. 25-cv-06100-TLT

HON. TRINA L. THOMPSON

**STATUS REPORT AND REQUEST
TO VACATE CASE MANAGEMENT
DEADLINES AND EXTEND TIME
FOR SERVICE**

1 Plaintiff Liberty Troll LLC (“Plaintiff”) respectfully submits this Status Report
 2 pursuant to the Court’s July 21, 2025 Order Setting Initial Case Management Conference
 3 & ADR Deadlines (ECF No. 4). In light of recent developments, including ongoing efforts
 4 to serve the current defendant, the identification of an additional defendant, and the
 5 issuance of a copyright registration, Plaintiff further requests that the Court vacate the
 6 existing case management deadlines and extend the time for service.

7 **Status of Service**

8 This action concerns online copyright infringement committed via the anonymous
 9 YouTube channels “Dr. Dave Frauditor Terminator” and “Dr. Dave Debunker of
 10 Frauditors.” The Complaint was filed on July 19, 2025. Counsel sent a request to Defendant
 11 seeking an acknowledgment of service, which was ignored. Plaintiff then retained a process
 12 server to serve Ms. Buma, but service was unsuccessful.

13 During this period, Plaintiff discovered additional claims against another defendant
 14 that will require amendment of the Complaint. Plaintiff has also recently obtained a
 15 copyright registration, which permits the assertion of additional infringement claims.

16 **Rule 4(m)**

17 Rule 4(m) requires service within 90 days after the Complaint is filed. The Court has
 18 broad discretion to extend this period. *See Lemoge v. United States*, 587 F.3d 1188, 1198
 19 (9th Cir. 2009). Plaintiff has made diligent efforts to serve Defendant but has been
 20 unsuccessful. Because Plaintiff must amend the Complaint to add an additional defendant
 21 and claims, Plaintiff respectfully requests an additional 90 days to complete service.

22 **Request for Relief**

23 Plaintiff respectfully requests that the Court:

- 24 1. Vacate the deadlines set in the July 21, 2025 Order Setting Initial Case
 25 Management Conference & ADR Deadlines (ECF No. 4), including the October 2, 2025
 26 ADR and Rule 26(f) deadlines, the October 16, 2025 initial disclosures and joint case
 27 management statement deadlines, and the October 23, 2025 Initial Case Management
 28 Conference;

2. Reset case management deadlines to a date approximately 90 days after Plaintiff files proof of service; and

3. Extend the time to serve the Complaint pursuant to Fed. R. Civ. P. 4(m) by 90 days.

Dated: September 29, 2025

/s/ Randall S. Newman

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